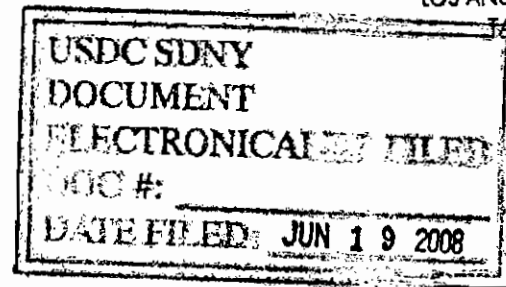


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June 18, 2008

**VIA FACSIMILE**

Honorable Laura T. Swain  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St., Room 755  
New York, NY 10007

**MEMO ENDORSED**

Re: *LHB Insurance Brokerage Inc. v. Citigroup Inc., et. al.*,  
No. 08-CV-3095 (LTS)

Dear Judge Swain:

We represent Plaintiffs Wedgewood Tacoma LLC and Jemstone LLC (the "Wedgewood Movants"), who moved for Consolidation, Appointment as Lead Plaintiffs, and Approval of Lead Plaintiffs' Selection of Lead Counsel on May 27, 2008 (Dkt.# 13) in the above-referenced matter. For the reasons discussed below, we respectfully request leave to file a single reply memorandum of law of no more than 15 pages in further support of the Wedgewood Movants' motion. The lead plaintiff reply briefing in this case is due on this coming Friday, June 20, 2008. Counsel for the Wedgewood Movants have inquired as to the positions of counsel for the other parties with respect to this requested page extension, and have received no objections.

In addition to replying to the arguments opposing the Wedgewood Movants' motion for Lead Plaintiff appointment and choice of Lead Counsel under the 1995 Private Securities Litigation Reform Act in the cases involving claims under the Securities Exchange Act of 1934 (the "Exchange Act Actions")<sup>1</sup>, the Wedgewood Movants must also reply to the plaintiffs in *Stockhamer v. Citigroup Inc.*, No. 1:08-CV-3904 (S.D.N.Y. filed Apr. 25, 2008) (which involves Investment Advisors Act of 1940 claims as well as pendent state law claims), who oppose the

<sup>1</sup> The four Exchange Act Actions are: *LHB Insurance Brokerage Inc. v. Citigroup Inc., et. al.*, C.A. No. 08-CV-3095 (LTS) (filed Mar. 26, 2008), *Swanson v. Citigroup Inc.*, No. 1:08-CV-3139 (S.D.N.Y. filed Mar. 27, 2008) (LTS); *Wedgewood Tacoma LLC v. Citigroup Inc.*, No. 1:08-CV-4360 (S.D.N.Y. filed May 8, 2008) (LTS); and *Ghalayini v. Citigroup, Inc.*, Case No. 1:10-CV-506-UA (S.D.N.Y. filed May 30, 2008), all of which bring claims under the Securities Exchange Act of 1934.

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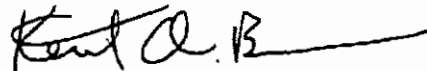
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Page 2

WedgeWood Movants' request for consolidation and appointment of interim lead counsel therein.<sup>2</sup>

Since no other current movant in this case appears to be seeking consolidation of the *Stockhamer* action,<sup>3</sup> the WedgeWood Movants are the only party having to reply to the *Stockhamer* Opposition. Because of the overlap of background of the motions, and because of the need to reply to two different crossing briefs raising multiple issues, we believe it is more efficient to reply in a single consolidated brief of up to 15 pages, which is 5 pages less than what we would be entitled to if we filed separate briefs.

If the Court wishes to discuss this request, we are available to do so at the Court's convenience.

Respectfully submitted,



Kent A. Bronson

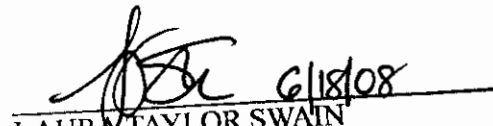
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*The request is granted.*

SO ORDERED.

  
LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE

<sup>2</sup> Only the *WedgeWood Tacoma* action brings claims under both the Securities Exchange Act of 1934 and the Investment Advisors Act of 1940.

<sup>3</sup> One group of lead plaintiff movants in the Exchange Act Actions, the Dignam Group, also previously sought consolidation of the *Stockhamer* action, but has apparently withdrawn its motion for lead plaintiff and filed a statement of non-opposition to one of the other competing lead plaintiff movants. See Dkt.# 17 and 30.